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**UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT**

**Oil and Gas Surface Management
Self-Assessment**



**Division of Fluid Minerals (WO-310)
2005-2006**

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UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

OFFICE OF THE DISTRICT MANAGER
SALT LAKE CITY, UTAH



BY SPECIAL INSTRUCTIONS OF THE
DISTRICT MANAGER

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Executive Summary

In 2003, the Bureau of Land Management (BLM) Washington Office (WO) Division of Fluid Minerals increased its oversight of the BLM's Oil and Gas Surface Management Program, 1310-PP. The Washington Office initiated the development of new policy guidance, workshops, training courses, handbooks, and outreach materials. A self-assessment of the Oil and Gas Surface Management Program was conducted by the Minerals, Realty and Resource Protection Directorate (WO-300) during Fiscal Year (FY) 2005. The objective of the assessment was to determine if the Oil and Gas Surface Management Program processes are being conducted in an effective manner and to identify areas for further program development.

Washington Office personnel developed and distributed a program assessment questionnaire to the following BLM Field Offices: Bakersfield, California; Glenwood Springs, Colorado; Miles City, Montana; Carlsbad, New Mexico; Moab, Utah; and Rawlins, Wyoming. The questionnaire was completed by employees that are involved in the Oil and Gas Surface Management Program. A total of 76 responses were received, averaging 12.7 responses per office, sufficient to obtain a good cross-section of surface program staff in each office.

The scope of the assessment focused on the following areas: General information; Planning and Lease Sale Parcel Review; Review and Processing of Application for Permit to Drill (APD) Surface Use Plans; Surface Environmental Inspections; Program Guidance and Training; and Program Management, Staffing, and Workload.

The majority of the responses indicate that the planning and lease sale parcel review process is efficient. Forty-seven percent of respondents indicated that the Field Office land use plans contain comprehensive and detailed exception, waiver, and modification criteria for lease stipulations, while 21 percent did not agree. Several respondents stated that the land use plans adequately address oil and gas leasing, although others indicated that the state of some land use plans may not be adequate to support the current interest in leasing.

Respondents indicated that database shortcomings slow the processing of oil and gas leases and stated that parcel review could be automated and thereby made more efficient. Others are suggesting the need for an up-to-date cultural resource database as well.

Respondents stated that conflicting guidance from various programs are hampering the ability of the staff to make timely and adequate decisions. The respondents were positive about the sufficiency of guidance that they had received from both Washington and the State Offices, with a slightly more positive feeling about the Washington Office guidance than that from State Offices.

There appears to be general agreement across the staff disciplines that APD processing is a high priority. In addition, about 77 percent of respondents consider the effectiveness of the current APD process within their office as good or excellent. Employee responses to

questions about specific elements of APD processing show that a positive approach to APD processing is being undertaken by the Field Offices. A majority felt that the office met with the operators prior to filing Notices of Staking and APDs and a majority felt that the office encouraged operators to file multiple-well APD packages. The respondents seem knowledgeable of the time required to process APDs. The respondents felt that delays in the approval of APDs were not because of inefficient staff or process, but the heavy work load, incomplete APDs submitted by operators, or untimely wildlife and cultural inventories submitted by operators.

The most common comment was the need for improved APD submissions from the operators and other operator-related issues such as speculative APD submissions, lack of early contact, and changing operator development plans. The submission of only complete and necessary APDs would further reduce BLM's workload and expedite the process.

Nearly all respondents who were aware of the Automated Fluid Minerals Support System (AFMSS) documentation requirements agreed that most surface and environmental inspections are being documented in AFMSS. Frequent system shutdowns are having an effect on timely data entry.

Nearly 70 percent stated that they have attended sufficient training or workshops to perform their surface management duties. A high percentage of respondents (95 percent) stated that their supervisors supported their career development and training needs.

A majority of respondents indicated that the Field Offices have a person dedicated to the Oil and Gas Surface Management Program, but the majority did not know whether the State Offices did too. Eighty-nine percent of the respondents indicated that they enjoy their work.

Recommendations for correcting the above deficiencies include:

- Taking steps to ensure Washington and State Office issued guidance is consistent within the program and between the various programs the BLM manages;
- Keeping databases and land use plans current to ensure an efficient mineral leasing and development process;
- Issuing WO policy to further clarify the use of lease stipulation exceptions, waivers, and modifications;
- Distribution of the newly revised Oil and Gas Gold Book to operators to assist in improving the quality of APDs;
- Conducting a work flow analysis to determine specific bottlenecks in offices where particular staffing and workload problems are noted;
- Considering appropriate environmental Best Management Practices (BMPs) during onsite and in National Environmental Policy Act (NEPA) documents to mitigate anticipated impacts to surface resources;
- Dedicating a person in each State Office to oversight of the Fluid Minerals Surface Management Program;

- Instituting statewide workshops, training, and listening sessions with the BLM, operators, local governments, and the public;
- Encouraging employees to attend the BLM's diverse surface management-related training courses developed by the National Training Center (NTC) including Surface Management of Fluid Minerals, Construction and Reclamation; Visual Resource Management for Fluid Minerals, Planning, NEPA, Inspection and Enforcement.

Background

The Oil and Gas Surface Management Program includes: land use planning for oil and gas minerals; preleasing review; permit review; NEPA analysis, mitigation development, and documentation; permit approval; compliance; and training. The land use planning process determines what lands are available for oil and gas leasing and what restrictions may be placed on specific leases (based on protection of other resources values). Lessees or their operators must file Notices of Intent or Sundry Notices to conduct geophysical exploration and APDs to develop their leases. The APDs contain detailed surface use plans that are evaluated by the BLM or another involved surface management agency, and develop site-specific Conditions of Approval (COA), to mitigate surface and resource impacts. Subsequent field operations are inspected by the BLM or other surface management agencies to assure that the operations follow lease stipulations and COAs. Compliance inspections are conducted before, during, and after development to ensure compliance with the approved permit.

Evaluation Objective and Scope

A self-assessment was conducted during FY 2005 of the BLM Oil and Gas Surface Management Program to determine if the program processes are being conducted in an effective manner and in accordance with policy and regulations. A self-assessment questionnaire was developed by the Washington Office, Fluid Minerals Group (WO-310) and the Division of Evaluations and Management Service (WO-830). The questionnaire was distributed electronically to the following BLM Field Offices: Bakersfield, California; Glenwood Springs, Colorado; Miles City, Montana; Carlsbad, New Mexico; Moab, Utah; and Rawlins, Wyoming.

Methodology

A self-assessment questionnaire (Appendix 1) for the Oil and Gas Surface Management Program was sent electronically to a limited number of program offices. The questionnaire was completed by employees involved in the Oil and Gas Surface

Management Program. A total of 76 responses were received. The questionnaire was divided into the following six general areas:

- General Information;
- Planning and Lease Sale Parcel Review;
- Review and Processing of APD Surface Use Plans;
- Surface Environmental Inspections;
- Program Guidance and Training; and
- Program Management, Staffing, and Workload.

Each topic area contained a series of questions often prompting a "yes or no" answer or requested a narrative response. Following this series of questions the respondents were asked to provide comments in an open format.

Prior to administering the self-assessment survey, the Washington Office personnel conducted telephone interviews with three field offices in order to better refine the survey questions. The Vernal, Utah; Price, Utah; and Farmington, New Mexico Field Offices were selected to participate in the initial telephone interviews. The telephone interviews were conducted with one supervisory and two nonsupervisory personnel.

Areas of Positive Performance

Planning and Lease Sale Parcel Review

The majority of the general responses indicate that the planning and lease sale parcel review process is efficient.

Review and Processing of APD Surface Use Plans

The general responses were positive in that all respondents felt that a high priority was placed on APD processing.

A majority felt that the office met with the operators prior to filing Notices of Staking and APDs and a majority felt that the office encouraged operators to file multiple-well APD packages. The respondents seem knowledgeable of the time required to process APDs. The time to process APDs reported by the Field Offices closely matches the BLM's APD processing statistics.

The BLM has revised the Oil and Gas Gold Book and is revising Onshore Oil and Gas Order No. 1. This will help improve the quality of APDs filed by operators and will encourage early contact by the operator to identify and resolve issues early in the process.

Surface Environmental Inspections

A high percentage of respondents indicated that their offices are requiring recontouring to original contour or a contour that blends with the surrounding topography for locations,

roads, and pipelines. Recontouring to the original contour or one that blends with the landscape is a key aspect of reclamation as outlined in the Gold Book, 4th Edition.

Program Guidance and Training

A relatively high percentage of the respondents indicated that they are receiving sufficient guidance on the Surface Management Program from the Washington Office. Fifty-seven percent indicated that they were receiving sufficient program guidance, training, and support from the State Offices.

Nearly 70 percent of respondents stated that they have attended sufficient training or workshops to perform their surface management duties. A high percentage of respondents stated that their supervisors supported their career development and training needs.

Program Management, Staffing, and Workload

Eighty-two percent of respondents indicated that the Field Offices have a person dedicated to the oil and gas surface management program. Eighty-nine percent of the respondents indicated that they enjoy their work.

Opportunities for Improvement

Planning and Lease Sale Parcel Review

Finding:

This assessment revealed that conflicting guidance from various programs hampers the ability of the staff to make timely and adequate decisions. One commenter felt that the BLM has created "an impressive array of conflicting guidance from all programs related to the issue..."

Recommendation:

The Division of Fluid Minerals and State Offices should develop new oil and gas surface management guidance through a process of fully coordinating with the State Offices and other resource programs that are affected. Federal policy established by the Washington Office and State Offices through Instruction Memoranda (IM) on procedures regarding leasing, permitting, and surface management should be in clear and unambiguous language, and must be implemented by bureau offices.

Finding:

This assessment revealed database shortcomings that are slowing the lease process. For example, the cultural resources Field Office databases may not be sufficiently up-to-date in all offices, and access to the database may be too limited to ensure an efficient Cultural Resources, NEPA, and APD review process.

Recommendation:

All Field Office databases should be kept up-to-date to ensure science-based NEPA documentation and efficient processing of permits. State Offices should encourage database updates as time and funding allow. This action is currently being implemented by many Field Offices and should continue in all Field Offices.

Finding:

This assessment revealed that, in some cases, land use plans are not adequate or up-to-date to support the current leasing activity.

Recommendation:

Field Offices should keep land use plans current through a regular program of plan maintenance, amendment, and revision to avoid deferring or delaying lease parcels.

Finding:

The criterion for determining when or if exceptions, waivers, and modifications will be granted for lease stipulations is not well defined.

Recommendation:

Land use plans should outline clear criteria for considering and approving appropriate exceptions, waivers, and modifications of lease stipulations. The Washington Office should issue an Instruction Memorandum containing policy for the development of criteria for the appropriate use of exceptions, waivers, and modifications. This task should be implemented by the Division of Fluid Minerals and the Division of Planning and Science Policy to supplement existing guidance.

Review and Processing of APD Surface Use Plans

Finding:

This assessment revealed delays in processing of APD Surface Use Plans due to the submission of incomplete APDs, late submission of wildlife and cultural inventories, speculative APD filings, lack of early contact, and changing plans by operators.

Recommendation:

When operators submit "complete" APDs and only proposals that are likely to get drilled, the approval process is more efficient and the BLM can process permits more quickly and at less cost. The BLM has revised the Oil and Gas Gold Book and is revising Onshore Order No. 1 to encourage operators to use best business practices to facilitate timely APD processing. This revised guidance should help operators improve the quality of APDs filed and will encourage the operator to contact the BLM early-on for planning purposes. The Washington Office has recommended in IM 2006-071 *Process Improvement for Oil, Gas, Geothermal, Geophysical, and Related Rights of Way Approvals* that Field Offices work more closely with operators, especially early in the process to identify and plan for future development needs rather than allowing development to occur in a less structured manner. To be implemented by the Field Offices.

Finding:

Splitting or sharing the processing of individual APDs and inspections between different offices can create inconsistency and communication lapses if staffs do not coordinate closely.

Recommendation:

Where downhole, surface, and adjudication processes are split between Field Offices, the respective staff and managers should work closely to ensure an efficient and well-coordinated process. To reduce staffing costs, two adjacent Field Offices may choose to split the APD permitting and inspection tasks, especially when one of the offices has limited APD processing or inspection demand or a lack of scarce skills. All Field Offices sharing APD permitting or well inspections are encouraged to coordinate and communicate regularly through short meetings, phone calls, e-mails. This task is to be implemented by the Field Offices.

Finding:

This assessment revealed that third-party NEPA documents can be a concern.

Recommendation:

Third-party NEPA documents must comply with the NEPA and BLM policy and standards including consideration of environmental BMPs and analysis of a range of reasonable alternatives in Environmental Impact Statements. The BLM is responsible for ensuring all third-party NEPA documents comply with the NEPA and Bureau standards. Field Offices shall comply with Washington Office policy, as established in IM 2004-194 and consider incorporation of appropriate environmental BMPs into NEPA documents to mitigate anticipated impacts to surface and subsurface resources. Field Offices are to encourage operators to actively consider incorporating BMPs into their APDs in order to simplify the NEPA analysis. The Quality Assurance Teams, conducted by the Division of Fluid Minerals, concluded in IM 2006-071 *Process Improvement for Oil, Gas, Geothermal, Geophysical, and Related Rights of Way Approvals* that usage of the Documentation of NEPA Adequacy worksheets [and the new Section 390 Categorical Exclusions] should be increased by writing more site-specific "field development" Environmental Assessments (EA) and Environmental Impact Statements (EIS). Implementation of procedures as set forth by IM 2006-071 and IM 2005-247 *National Environmental Policy Act Compliance for Oil, Gas, and Geothermal Development* can assist in improving the NEPA process and documents developed by operators and the review process by BLM staff. This task will be implemented by the Field Offices.

Surface Environmental Inspections

Finding:

Offices are continuing to evaluate staffing needs to ensure there is a balance between permitting and inspection needs.

Recommendation:

Staffing should be sufficient for meeting the requirements of the Inspection and Enforcement Strategy. As mandated by the Energy Policy Act of 2005, pilot offices have

been established to focus funding and staffing on offices with high priority workloads. Field Offices should implement procedures identified in Washington Office IM 2006-071, *Process Improvement for Oil, Gas, Geothermal, Geophysical, and Related Rights of Way Approvals*, which provides guidelines for using staffing in a more efficient manner. To perform permit processing functions and complete necessary surface inspections, Field Offices should consider supplementing existing oil and gas staff with other Field Office staff that may hold diverse experience and skills such as range science, biology, soils, forestry, and engineering. Reallocate funding, as necessary, to support a sufficient level of inspections. Consider the use of BLM or industry funded Quality Assurance/Quality Compliance contractors to inspect large operations while the BLM provides oversight. This task will be implemented by the Field Offices.

Finding:

This assessment revealed that input of data into AFMSS is a problem. Respondents indicated that AFMSS is often off-line due to legal issues, for example, *Cobell v. Norton*.

Recommendation:

Data should always be input into AFMSS in a timely manner, provided the system is accessible. Data entry that has been delayed due to inaccessibility of AFMSS should be entered as soon as the system comes back online. To comply with legal requirements, improvements to AFMSS are currently being undertaken by the Division of Fluid Minerals and a separate database for Indian and Non-Indian AFMSS has been developed to ensure compliance. When the systems are activated, data needs to be entered by the Field Offices in a timely manner. To be implemented by the Washington Office and Field Offices.

Finding:

Respondents have indicated that some companies, particularly smaller ones, give a low priority to reclamation.

Recommendation:

Interim and final reclamation, as defined in Chapter 6 of the Gold Book, Fourth Edition, should be a high priority for Field Offices and all operators. Proper reclamation helps to mitigate the development of oil, gas, and geothermal resources, both long- and short-term. Field and State Office are encouraged to conduct workshops, training, and listening sessions within the BLM and with operators, local government, and the public, on the new standards and guideline found in Chapter 6 of the Gold Book to ensure proper interim and final reclamation. This task will be implemented by the Field Offices.

Finding:

This assessment revealed concerns that some BMPs are not locally developed and that those that are locally developed better comply with land use plans and other local conditions.

Recommendation:

Environmental BMPs are not one size fits all. The actual best practices and mitigation measures for a particular site are evaluated through the permit and environmental review process and vary to accommodate unique, site-specific conditions and local resource conditions. Consideration of appropriate BMPs in all APDs is the Bureau policy. Field Offices must consider BMPs that would be appropriate for the site-specific situation. Staff must move beyond practices that have been traditionally used in the local area and look outside their area for new ideas that will better accomplish the desired task and meet Bureau standards. Field Offices must also be cautious to avoid the one size fits all approach to the application of BMPs, as explained in IM 2004-194. BMPs should be flexible to respond to new data, site development, operator capabilities, public concern, etc. Following implementation, Field Offices should monitor, evaluate, and modify BMPs as necessary for use in future permit approvals. This task will be implemented by the Field Offices.

Program Guidance and Training**Finding:**

Respondents have indicated that additional training is desired.

Recommendation:

Staff should be provided the opportunity to attend adequate training to accomplish their job duties. The BLM offers diverse surface management training courses developed by the National Training Center (NTC) and Washington Office, such as the new Surface Management of Fluid Minerals Development course, Visual Resource Management for Fluid Minerals, and a future Construction and Reclamation Dirtwork course currently in the design phase. Other NTC courses appropriate for surface management specialists may include: planning; NEPA; inspection and enforcement; petroleum engineering technician; and rights-of-way, pipeline systems. The BLM Washington Office, State Offices, and the oil and gas industry also offer conferences and workshops. Field staff are encouraged to attend appropriate, career development training.

Finding:

This assessment revealed inconsistency in guidance and policy. In some cases the State Office may not adequately answer questions, thereby leaving the Field Office specialists to interpret policy for themselves. Respondents indicated that when the State Offices do issue policy, some Field Offices choose to not implement it.

Recommendation:

Policy set by the State Offices must be consistent with Washington Office policy, implemented by the Field Offices, monitored by the State Offices for follow-through, and allow the opportunity for feedback from the Field Offices. The BLM should revisit how policy and guidance is conveyed to the State and Field Offices and take the necessary actions needed to enforce adherence to policy. Annual statewide program workshops are recommended to discuss what works and what does not, and to clarify and enforce policy. State Offices should dedicate staff to the oversight and development of the Fluid

Minerals Surface Management Program. This task will be implemented by the State and Field Offices.

Program Management, Staffing, and Workload

Finding:

This assessment revealed that 59 percent of respondents stated that the Oil and Gas Surface Management Program workload level is excessive and none felt it was light.

Recommendation:

Staff workload levels should not be so high as to cause employee burnout and lost productivity. The Washington Office continues to work with State and Field Offices in identifying ways to improve the efficiency of the work to be performed when working with uncertain budgets, such as increasing staffing, rotating staff, contracting. Task will be implemented by the Division of Fluid Minerals and State Offices.

General Comments for Improvement of the Program

Respondents were asked to suggest changes that would enhance the ability of their office to improve oil and gas surface management. These general staff comments should be taken into consideration by Field and State Office staff and managers.

Some of the individual staff comments included:

- Increase staffing (resource specialists and clerical personnel);
- Improve the cultural report review process to make it more efficient;
- A current electronic database should be created for the cultural and paleontological resources;
- Hire seasonal employees to help address Section 106 compliance so that staff archeologists could devote additional time to processing APDs;
- Fill vacant positions that are critical to improving productivity;
- Utilize excess staff more effectively;
- Improve the balance of clerical staffs for APDs and Rights-of-Way (ROW). APDs are often associated with ROWs, but an increase in APD clerical staff has outpaced that of ROW processing;
- Additional field compliance inspections are necessary for all stages of operations (construction, operations, and reclamation);
- Increase involvement from management to improve their awareness of the program; and
- State Office should establish a training program in which a small number of trainees work in different field offices while learning the process.

CONCLUSIONS

This assessment was conducted to analyze whether the Oil and Gas Surface Management Program processes are being conducted in an effective manner and in accordance with policy and regulations. The goal was to identify issues within the areas of General Information; Planning and Lease Sale Parcel Review; Review and Processing of APD Surface Use Plans; Surface Environmental Inspections; Program Guidance and Training; and Program Management, Staffing, and Workload that can hinder the efficiency and timeliness of the land use planning and oil and gas development process. By identifying areas of improvement within the Oil and Gas Surface Management Program, Field and State Offices can implement strategies and procedures that address these issues and improve the quality of APD processing.

The majority of responses indicate that most aspects of the program involving land use planning, APD processing, and inspection and enforcement are efficiently managed. The majority of the offices have implemented creative solutions to staffing concerns, such as using the staff in nearby Field Offices or the development of pilot offices to handle permit processing and inspections. Additional training and utilization of people with more diverse backgrounds is being used by Field Offices to maximize the effectiveness and efficiency of their office.

The Washington Office will continue to work with the State and Field Offices in developing new training and implementing efficient, environmentally sound, and technically reliable procedures for developing and producing oil, natural gas, and geothermal resources on Federal lands in an efficient manner. Field and State Offices are encouraged to continue progress toward ensuring an efficient, effective, and environmentally responsible Surface Management Program.

Oil & Gas Surface Management Program Self-Assessment

Objective: The purpose of this self-assessment questionnaire is to determine if oil and gas surface management program processes are being conducted in an effective manner.

Note: This questionnaire covers the process of Reviewing APD Surface Use Plans; process of Conducting Onsite & Surface Inspections; Achieving Compliance; Participation in Land Use Planning & NEPA Processes; the process of Reviewing Lease Sale Parcels; and Program Guidance/Training. When completing the survey please answer "yes" or "no", fill in the blank, select from the multiple choices, or provide a narrative response. Please complete all questions and be very candid in your response. All responses from your survey will be confidential and any feedback will be generalized to ensure anonymity.

General

1. Where do you work?

- ☐ State Office _____
- ☐ Field Office _____
- ☐ District Office _____

2. Are you a supervisor or non-supervisor?

- ☐ Supervisor
- ☐ Non-Supervisor

3. Please indicate your job title:

- ☐ Adjudication, AFMSS or Clerical Personnel
- ☐ Archaeologist
- ☐ Field Manager
- ☐ Geologist
- ☐ Mineral Supervisor
- ☐ NEPA Coordinator
- ☐ Petroleum Engineer
- ☐ Surface Protection Specialist
- ☐ Wildlife Biologist
- ☐ Other Resource Specialist

Planning & Lease Sale Parcel Review

4. Does the Field Office have an efficient lease sale parcel review process?

- ☐ Yes
- ☐ No
- ☐ Do not know

5. Does the Field Office land use plans contain appropriate (comprehensive and detailed) exception, waiver, and modification criteria for lease stipulations?

- ☐ Yes
- ☐ No
- ☐ Do not know

6. Are you aware of any backlog of industry nominated parcels due to the lack of appropriate NEPA documentation?

- ☐ Yes
- ☐ No
- ☐ Do not know

7. Are you aware of any backlog of industry nominated parcels due to the lack of appropriate Tribal consultation?

- ☐ Yes
- ☐ No
- ☐ Do not know

8. Are you aware of any backlog of industry nominated parcels due to the lack of appropriate Section 106 Cultural consultation?

- ☐ Yes
- ☐ No
- ☐ Do not know

9. Please provide any additional comments or explanations you may have about ***Planning & Lease Sale Parcel Review***.

Review and Processing of APD Surface Use Plans

10. What is the priority placed on APD processing by the Field Office for the following positions?

Adjudication, AFMSS and Clerical Staff

- ☐ High
- ☐ Medium
- ☐ Low

11. Archaeologist

- ☐ High
- ☐ Medium
- ☐ Low

12. Field Manager

- ☐ High
- ☐ Medium
- ☐ Low

13. Geologist

- ☐ High
- ☐ Medium
- ☐ Low

14. Minerals Supervisor

- ☐ High
- ☐ Medium
- ☐ Low

15. NEPA Coordinator

- ☐ High
- ☐ Medium
- ☐ Low

16. Petroleum Engineer

- ☐ High
- ☐ Medium
- ☐ Low

17. Surface Protection Specialist

- ☐ High
- ☐ Medium
- ☐ Low

18. Wildlife Biologist

- ☐ High
- ☐ Medium
- ☐ Low

19. Other Resource Specialists

- ☐ High
- ☐ Medium
- ☐ Low

20. Does your office meet with the operator prior to the submission of a Notice of Staking or APD to discuss in general the operator's plans for development, typical BLM and Field Office requirements, and local resource issues?

- ☐ Yes
- ☐ No
- ☐ Do not know

21. Does your office work up front with the operators to ensure the submission of APDs that meet most of the Bureau's needs and require few surface conditions of approval?

- ☐ Yes
- ☐ No
- ☐ Do not know

22. Does your office encourage operators to submit multiple APD packages, master drilling plans, or plans of development covering multiple wells and roads?

- ☐ Yes
- ☐ No
- ☐ Do not know

23. Are most complete APDs processed in your office from the date of receipt, within:

- ☐ 35 days or less (go to question 26)
- ☐ 36 to 60 days (go to question 26)
- ☐ greater than 60 days (go to question 25)

24. APD processing delays are most often due to: (select all those that are significant sources of delay)

- ☐ Incomplete APD
- ☐ Inefficient process
- ☐ Inefficient staff
- ☐ NEPA
- ☐ Cultural
- ☐ Wildlife
- ☐ Heavy Workload

25. How would you rank the effectiveness of the APD process within your office?

- ☐ Excellent
- ☐ Good
- ☐ Fair
- ☐ Poor
- ☐ Do not know

26. Does the State Office generally concur with the Field Office during the State Director's APD Review Process?

- ☐ Yes
- ☐ No
- ☐ Do not know

27. When the State Office does not concur with the Field Office during the State Director's Review Process, do the modifications appear reasonable and does the State Office provide appropriate guidance to explain its decision?

- ☐ Yes
- ☐ No
- ☐ Do not know

28. What can be done to improve the APD process?

29. Please provide any additional comments or explanations you may have about the ***Review and Processing of APD Surface Use Plans***.

Surface Environmental Inspections

30. Does your office conduct the following: (select all that apply)

- ☐ Notice of Staking or APD onsite inspections for all wells
- ☐ Drilling surface environmental inspections for most wells
- ☐ Production surface environmental inspections for most wells
- ☐ Final reclamation surface environmental inspections for all wells

31. At final reclamation, do you require nearly all well locations, pipeline, and access roads to be recontoured to the original contour or a contour that approximates and blends with the surrounding topography?

- ☐ Yes
- ☐ No
- ☐ Do not know

32. Have you reviewed the environmental Best Management Practices (BMPs) shown on the Technical Information page at www.blm.gov/bmp?

- ☐ Yes
- ☐ No
- ☐ Do not know

33. Does your office routinely consider and incorporate into APD approval appropriate environmental BMPs similar to those shown at www.blm.gov.bmp?

- ☐ Yes
- ☐ No
- ☐ Do not know

34. Does your office document nearly all environmental surface inspections in AFMSS?

- ☐ Yes
- ☐ No
- ☐ Do not know

35. For environmental surface inspections documented in AFMSS, are comments always added to the comment section?

- ☐ Yes
- ☐ No
- ☐ Do not know

36. Does your office document nearly all surface environmental inspections in the case file?

- ☐ Yes
- ☐ No
- ☐ Do not know

37. Please provide any additional comments or explanations you may have about **Surface Environmental Inspections**.

Program Guidance and Training

38. Are you receiving sufficient guidance from the Washington Office on the Oil and Gas Surface Management Program?

- ☐ Yes
- ☐ No

39. Are you receiving sufficient guidance, training and support from the State Office on the Oil and Gas Surface Management Program?

- ☐ Yes
- ☐ No

40. Check the following training sessions you have attended:

- ☐ National Oil and Gas conference or workshop
- ☐ State-wide Oil and Gas conference or workshop
- ☐ 3000-19 Surface Management for Minerals
- ☐ 3000-20 Reclamation
- ☐ Dirtwork in the Oil patch
- ☐ A NEPA class
- ☐ Land Use Planning training
- ☐ Visual Resource Management BMPs for Oil and Gas

41. Have you attended sufficient training/workshops to enhance your ability to perform your assigned surface management program duties?

- ☐ Yes
- ☐ No

42. If you answered no, please explain.

43. What additional training or guidance would you like to receive?

44. Does your supervisor support your career development and training needs related to the oil and gas program?

- ☐ Yes
- ☐ No

Program Management, Staffing, and Workload

45. Does the State Office have a person dedicated to the oil and gas surface management program?

- ☐ Yes
- ☐ No
- ☐ Do not know

46. Does the Field Office have a person dedicated to the oil and gas surface management program?

- ☐ Yes
- ☐ No
- ☐ Do not know

47. Do you generally enjoy your work?

- ☐ Yes
- ☐ No

48. Are the oil and gas surface management program workload levels:

- ☐ Light
- ☐ Appropriate
- ☐ Excessive
- ☐ Do not know

49. If you could change one or two things in your office to improve or enhance your ability to do a better job within the oil and gas surface management program, what would it be?

50. Additional comments (optional)

Thank you for completing this survey!

Oil and Gas Surface Management Questionnaire Results

Planning & Lease Sale Parcel Review	Yes	No	Don't Know
Does the FO have an efficient lease sale parcel review process?	62.5%	12.5%	25%
Does the FO LUPs contain appropriate (comprehensive and detailed) exception, waiver, and modification criteria for lease stipulations?	47.2%	20.8%	31.9%
Are you aware of any backlogs of industry nominated parcels due to the lack of appropriate NEPA doc.?	18.3%	40.8%	40.8%
Are you aware of any backlogs of industry nominated parcels due to the lack of appropriate Tribal consultation?	1.4%	56.3%	42.3%
Are you aware of any backlogs of industry nominated parcels due to the lack of appropriate Section 106 Cultural consultation?	4.2%	51.4%	44.4%

Fig. 1
Planning & Lease Sale Parcel Review

Review and Processing of APD Surface Use Plans	High	Medium	Low
What is the priority placed on APD processing by the FO for the following positions? (Adjudication, AFMSS, Clerical, Archaeologist, FM, Geologist, Minerals Supv., NEPA Coord., PET, Surface Protection Spec., Wildlife Biologist, Other Resource Specialist)	80%	15%	5%
	Yes	No	Don't Know
Does your office meet with the operator prior to the submission of a NOS or APD to discuss in general the operator's plans for development?	58.6%	12.9%	28.6%
Does your office work up front with the operators to ensure the submission of APDs that meet most of the Bureau's needs and require few surface COA?	76.4%	6.9%	16.7%
Does your office encourage operators to submit multiple APD packages, master drilling plans, or plans of development covering multiple wells and roads?	65.3%	8.3%	26.4%
Does the State Office generally concur with the FO during the SO Director's APD Review Process?	29.9%	6.0%	64.2%
When the SO does not concur with the FO during the SO Director's Review Process, do the modifications appear reasonable and does the SO provide appropriate guidance to explain its decision?	13.4%	10.4%	76.1%
	35 days or less	36-60 days	Greater than 60 days
Are most complete APDs processed in your office from date of receipt, within:	33.3%	42.9%	23.8%
	Excellent	Good	Fair/Don't Know
How would you rank the effectiveness of the APD process within your office?	38.5%	40.4%	15.5%/5.8%

Fig. 2
Review and Processing of APD Surface Use Plans

Surface Environmental Inspections	Yes	No	Don't Know
At final reclamation, do you require nearly all well locations, pipeline, and access roads to be recontoured to the original contour or a contour that approximates and blends with the surrounding topography?	71.8%	5.6%	22.5%
Have you reviewed the environmental Best Management Practices (BMP) shown on the Technical Information page?	54.9%	38.0%	7.0%
Does your office routinely consider and incorporate into APD approval appropriate environmental BMPs similar to those shown on the website?	52.1%	2.8%	45.1%
Does your office document nearly all environmental surface inspections into AFMSS?	51.4%	1.4%	47.1%
For environmental surface inspections documented into AFMSS, are comments always added to the comment section?	22.9%	5.7%	71.4%
Does your office document nearly all surface environmental inspections into the case file?	42.9%	0%	57.1%

Fig. 3
Surface Environmental Inspections

Program Guidance and Training	Yes	No	
Are you receiving sufficient guidance from the WO on the Oil and Gas Surface Management Program?	72.4%	27.6%	
Are you receiving sufficient guidance, training, and support from the SO on the Oil and Gas Surface Management Program?	56.5%	43.5%	
Have you attended sufficient training/workshops to enhance your ability to perform your assigned surface management program duties?	69.4%	30.6%	
Does your supervisor support your career development and training needs related to the Oil and Gas program?	94.9%	5.1%	

Fig. 4
Program Guidance and Training

Program Management, Staffing and Workload	Yes	No	Don't Know
Does the SO have a person dedicated to the Oil and Gas Surface Management Program?	33.3%	9.7%	56.9%
Does the FO have a person dedicated to the Oil and Gas Surface Management Program?	81.9%	5.6%	12.5%
Do you generally enjoy your work?	88.9%	11.1%	-
	Light	Appropriate	Excessive
Are the Oil and Gas Surface Management Program workload levels:	-	26.8%	59.2% (14.1% Don't know)

Fig. 5
Program Management, Staffing and Workload

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240
<http://www.blm.gov>

August 31, 2006

In Reply Refer To:
2800/3100 (300) P

EMS TRANSMISSION 09/18/2006
Instruction Memorandum 2006-230
Expires: 09/30/2007

To: All Field Officials

From: Assistant Director, Minerals, Realty and Resource Protection

Subject: Implementing Recommendations from the Oil and Gas Surface Management Program Self-Assessment

Program Area: Oil and Gas Operations

Purpose: The purpose of this Instruction Memorandum (IM) is to implement recommendations from the 2005-2006 Oil and Gas Surface Management Program Self-Assessment Report.

Policy/Action: State and Field Offices with oil and gas programs shall implement the recommendations found in the Oil and Gas Surface Management Self-Assessment evaluation report (Attachment 1).

Timeframe: Implementation of recommendations is to take place by September 30, 2007.

Background: In 2003, the Bureau of Land Management (BLM) Washington Office (WO) Division of Fluid Minerals increased its oversight of the BLM's Oil and Gas Surface Management Program. The Washington Office initiated the development of new policy guidance, workshops, training courses, handbooks, and outreach materials. A self-assessment of the Oil and Gas Surface Management Program was conducted by the BLM's Washington Office Minerals, Realty and Resource Protection Directorate (WO-300) during Fiscal Year (FY) 2005. The objective of the assessment was to determine if the Oil and Gas Surface Management Program processes are being conducted in an effective manner and what the need might be for further program development.

Washington Office personnel developed and distributed a program assessment questionnaire to the following BLM Field Offices: Bakersfield, California; Glenwood Springs, Colorado; Miles City, Montana; Carlsbad, New Mexico; Moab, Utah; and Rawlins, Wyoming. The questionnaire was completed by employees involved in the Oil and Gas Surface Management Program. A total of 76 responses were received by the Washington Office. The scope of the assessment focused on the following areas: General information; Planning and Lease Sale Parcel Review; Review and Processing of Applications for Permit to Drill (APD) Surface Use Plans; Surface Environmental Inspections; Program Guidance and Training; and Program Management, Staffing, and Workload.

Budget Impact: Minimal.

Manual/Handbook Sections Affected: None.

Coordination: The evaluation was coordinated with Washington Office Division of Evaluations and Management Services (WO-830).

Contact: Please address any questions related to this IM to Jim Perry, Senior Natural Resource Specialist, Division of Fluid Minerals (WO-310), jim_perry@blm.gov, or by telephone at (202) 452-5063.

Signed by:
Thomas P. Lonnie
Assistant Director
Minerals, Realty and Resource Protection

Authenticated by:
Robert M. Williams
Division of IRM Governance, WO-560

1 Attachment

1- Oil and Gas Surface Management Program Self-Assessment (25 pp)